

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration
CASPAR CHAN, CSBN 294804
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: 510-970-4810
Facsimile: 415-744-0134
Email: Caspar.Chan@ssa.gov
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LORI OKERSTROM,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Civil No. 1:22-cv-00478-SKO

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

(Doc. 10)

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.

In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due July 21, 2022. Defendant has not previously requested an extension of this deadline.

2. The certified administrative record (CAR) in this case has not been finalized for filing. Counsel for the Commissioner has been in contact with the Office of Appellate Operations (OAO), which is responsible for preparation of CARs. OAO has advised that it will need approximately 60 days to finalize the CAR. Accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

1 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
2 has no objections.

3 4. This request is made in good faith and is not intended to delay the proceedings in this
4 matter.

5 WHEREFORE, Defendant requests until September 19, 2022, respond to Plaintiff's Complaint.

6 Respectfully submitted,

7
8 Date: July 12, 2022

LAW OFFICES OF FRANCESCO BENAVIDES

9 By: /s/ Caspar Chan for Francesco Benavides*

10 FRANCESCO BENAVIDES

11 *Authorized by email on July 12, 2022

Attorneys for Plaintiff

12 Date: July 12, 2022

PHILIP A. TALBERT

13 United States Attorney

14 Eastern District of California

15 By: /s/ Caspar Chan

CASPAR CHAN

16 Special Assistant United States Attorney

17 Attorneys for Defendant

18 ORDER

19 Pursuant to the parties' foregoing Stipulation, and for good cause shown, Defendant's deadline
20 to respond to Plaintiff's Complaint is hereby EXTENDED to **September 19, 2022**. All other deadlines
21 in the Scheduling Order (Doc. 5) are enlarged accordingly.

22
23 IT IS SO ORDERED.

24 Dated: **July 12, 2022**

/s/ Sheila K. Oberto

25 UNITED STATES MAGISTRATE JUDGE
26
27
28